August 15, 2011

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

RE: In the matter of LightSquared LLC request for modification of its authority for an ancillary terrestrial component; SAT-MOD-20101118-00239

Dear Secretary Dortch:

The AgriBusiness Association of Kentucky (ABAK) and its affiliate, the Kentucky Certified Crop Adviser Program, appreciates the opportunity to offer comment on the FCC’s recent decision to grant a waiver to LightSquared LLC to use its satellite spectrum to operate a high powered wireless broadband network. We have concerns that this decision will cause degradation of the Global Positioning Satellite (GPS) System’s accuracy and reliability.

ABAK represents businesses that ultimately provide farm inputs to Kentucky farmer producers. The membership represents companies on all levels of the distribution chain, from manufacturer, wholesaler, distributor, to the retailer level. The Kentucky CCA program represents professional agronomists across the state who provide advice and inputs to farmers.

Kentucky’s agriculture industry today reaps the benefits of enhanced technologies not the least of which are communications breakthroughs such as cellular service, broadband connections, and global positioning systems. Because of these technologies today’s farming operations are more efficient, more productive, and more environmentally sound.

However, we are concerned with the request by LightSquared LLC to use a system that would be incompatible with current GPS technology and may render the current GPS service ineffective. Millions of Americans depend on GPS technology every day and we cannot afford to jeopardize the important role it plays.

Kentucky is a rural state and our citizens and businesses need new and improved broadband access. We recognize the investment of companies that are willing to come forward with these new technologies and bring them to the marketplace. However, these advancements should not come at the expense of such an important tool in the lives of so many Americans.

We request that the FCC take immediate action to prohibit LightSquared LLC from operating new satellite spectrums near the GPS band unless a comprehensive, public, and impartial evaluation on the impact of other spectrum users can prove that no interference will occur.

Sincerely,

Tod A. Griffin
ABAK Executive Director
KyCCA Executive Secretary

“Serving Kentucky Agriculture”